

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

SUMNER SQUARE
1615 M STREET, N.W.
SUITE 400
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:

(202) 326-7999

January 25, 2019

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of the Kingdom of Saudi Arabia ("Saudi Arabia"), pursuant to ¶ III(d) of the Court's Individual Practices in Civil Cases, concerning a letter and accompanying exhibit that Saudi Arabia is submitting today in further support of its letter-motion filed on January 15, 2019 (ECF No. 4361), and in response to the letter-opposition of the Plaintiffs' Executive Committees ("Plaintiffs") filed on January 22, 2019 (ECF No. 4373).

Saudi Arabia's letter and accompanying exhibit (Exhibit C) refer to and discuss material that has been designated Confidential under the MDL Protective Order (ECF No. 1900). That material is among the materials that are the subject of the letter-motion (ECF No. 4361) to which today's submission relates. Saudi Arabia's justifications for maintaining this material under seal can be found in Saudi Arabia's letter-motion (ECF No. 4361) and Exhibit A attached to that letter-motion, which was filed with the Court under seal on January 15.

Immediately after the filing of this letter, counsel for Saudi Arabia will submit to chambers by electronic mail: (1) a copy of this letter; (2) a complete copy of Saudi Arabia's letter and Exhibit C, with all proposed redactions shown in yellow highlighting; and (3) clean copies of only those pages of Saudi Arabia's letter or Exhibit C as to which any redaction is proposed. Counsel for Plaintiffs will be copied on that submission. Saudi Arabia respectfully requests that the Court accept its filing and proposed redactions.

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

The Honorable Sarah Netburn
January 25, 2019
Page 2

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: Chambers of the Honorable George B. Daniels (via facsimile)
All MDL counsel of record (via ECF)